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November 27, 2007

VIA FACSIMILE ONLY 914-390-4085

The Honorable Charles L. Brieant
United States District Court
Southern District of New York
300 Quarapost Street
White Plains, NY 10601-4150

Re: Miguel Valle v. Thomas Moran, et al.
Civil Docket No.: 7:07-cv-8214 (CLB)

*Application Granted
to be Ordered
Nov. 28, 2007
L. Brieant
USDC*

Dear Judge Brieant:

Counsel in this case respectfully request an adjournment of the initial conference scheduled for December 7, 2007 be adjourned until February 29, 2008 for the reasons described herein.

Defendants filed a Motion to Dismiss raising the issue of absolute immunity. Plaintiff's counsel is the only civil litigator at this law firm and has a heavy schedule throughout the next two months. Counsel have agreed to an extension on the briefing schedule permitting plaintiff to respond to Defendants' Motion to Dismiss no later than January 28, 2008 and Defendants' Reply by February 25.

In addition, defendants are requesting the Court stay discovery while the motions are pending and commence at the time the motion is decided; we have no objection. Finally, we agree to hold the initial conference, argue motions, and commence discovery on February 29, 2008.

Thank you for your consideration in this matter.

Very truly yours,

Karen L. Mayer
Karen L. Mayer

KM/st

cc: Hillary J. Raimondi (via facsimile only 914-995-3132)